

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

DISPLAY TECHNOLOGIES LLC,

Plaintiff,

v.

RICOH AMERICAS CORPORATION,

Defendant.

Civil Action No. 2:15-cv-1631

JURY TRIAL DEMANDED

**PLAINTIFF DISPLAY TECHNOLOGIES LLC'S ANSWER TO DEFENDANT RICOH
AMERICAS CORPORATION'S COUNTERCLAIMS**

Plaintiff, Display Technologies LLC (“Plaintiff”), answers the Counterclaims of Defendant Ricoh Americas Corporation (“Defendant”) filed December 15, 2015 (Dkt. No. 14). Plaintiff answers the Counterclaims of Defendant by corresponding paragraph number as follows:

COUNTERCLAIMS

THE PARTIES

1. Admitted.
2. Admitted.

JURISDICTION AND VENUE

3. Plaintiff admits that these counterclaims purport to arise under the patent laws of 28 U.S.C. §§ 1331, 1338, the Patent Act, 35 U.S.C. § 100 *et seq.*, and 28 U.S.C. § 2201, *et seq.* Except as so admitted, the remaining allegations in paragraph 3 are denied.

4. Admitted.
5. Plaintiff admits that venue is proper under 28 U.S.C. §§ 1391(b)-(c) and 1400(b). Except as so admitted, the remaining allegations in paragraph 5 are denied.

FIRST COUNTERCLAIM
(Declaration of Non-Infringement)

6. Plaintiff incorporates by reference the allegations and statements set forth in the preceding paragraphs of these Answers to Defendant's Counterclaims in their entirety as if set forth herein.

7. Admitted.

8. Admitted.

9. Admitted.

10. Plaintiff admits an actual case or controversy has arisen and exists between Plaintiff and Defendant in regards to Defendant's infringement of the '195 Patent. Except as so admitted, the remaining allegations in paragraph 10 are denied.

11. Denied.

12. Plaintiff admits that Defendant seeks a judicial determination of its rights and duties with respect to the alleged infringement '195 Patent. However, Plaintiffs deny that Defendant is entitled to any such relief. Except as so admitted, the remaining allegations in paragraph 12 are denied.

13. Denied.

SECOND COUNTERCLAIM
(Declaration of Patent Invalidity)

14. Plaintiff incorporates by reference the allegations and statements set forth in the preceding paragraphs of these Answers to Defendant's Counterclaims in their entirety as if set forth herein.

15. Admitted.

16. Plaintiff admits that Defendant seeks a judicial determination of its rights and duties with respect to the alleged infringement '195 Patent. However, Plaintiffs deny that

Defendant is entitled to any such relief. Except as so admitted, the remaining allegations in paragraph 16 are denied.

17. Denied.

18. Plaintiff admits that Defendant seeks a judicial determination of its rights and duties with respect to the alleged invalidity '195 Patent. However, Plaintiffs deny that Defendant is entitled to any such relief. Except as so admitted, the remaining allegations in paragraph 18 are denied.

19. Denied.

JURY DEMAND

Defendant's Demand for Jury Trial is an averment to which no responsive pleading is required pursuant to FED. R. Civ. P. 8(d) and is therefore denied.

PRAYER FOR RELIEF

Defendant's Prayer for Relief is an averment to which no responsive pleading is required pursuant to FED. R. Civ. P. 8(d) and is therefore denied.

DATED January 5, 2016.

Respectfully submitted,

By: /s/ Krystal L. Gibbens
Hao Ni
Texas Bar No. 24047205
hni@nilawfirm.com
Timothy T. Wang
Texas Bar No. 24067927
twang@nilawfirm.com
Neal G. Massand
Texas Bar No. 24039038
nmassand@nilawfirm.com
Stevenson Moore V
Texas Bar No. 24076573
smoore@nilawfirm.com
Krystal L. Gibbens
Texas Bar No. 24082185

kgibbens@nilawfirm.com

NI, WANG & MASSAND, PLLC
8140 Walnut Hill Ln., Ste. 500
Dallas, TX 75231
Tel: (972) 331-4600
Fax: (972) 314-0900

**ATTORNEYS FOR PLAINTIFF
DISPLAY TECHNOLOGIES, LLC**

CERTIFICATE OF SERVICE

I hereby certify that on the 5th day of January, 2016, I electronically filed the foregoing document with the clerk of the court for the U.S. District Court, Eastern District of Texas, Marshall Division, using the electronic case filing system of the court. The electronic case filing system sent a “Notice of Electronic Filing” to the attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means.

/s/ Krystal L. Gibbens
Krystal L. Gibbens